American Forest & Paper Association

Submitted via electronic public comment form
October 30, 2026

RE: Comments related to Washington's Recycling Reform Act Draft Preliminary Needs Assessment

On behalf of the American Forest & Paper Association (AF&PA), thank you for the opportunity to comment on the draft preliminary needs assessment to support implementation of Washington's Recycling Reform Act.

AF&PA serves to advance public policies that foster economic growth, job creation, and global competitiveness for a vital sector that makes the essential paper and packaging products Americans use every day. The U.S. forest products industry employs more than 925,000 people, largely in rural America, and is among the top 10 manufacturing sector employers in 44 states. Our industry accounts for approximately 4.7% of the total U.S. manufacturing GDP, manufacturing more than $435 billion in products annually. AF&PA member companies are committed to making sustainable products for a sustainable future through the industry's decades-long initiative — *Better Practices, Better Planet 2030*. In Washington, the industry employs more than 27,000 individuals in 139 facilities, contributes $140 million in state and local taxes, and manufactures more than $13.1 billion in products annually.

Paper Recycling Works

Paper recycling is central to our industry's sustainability efforts and our goal to advance a circular value chain. Today, paper is one of the most highly recycled materials in the United States, and the paper industry is working to capture even more paper from the waste stream for recycling. Every day, recycled paper is transformed into new, essential products Americans rely on, supporting U.S. manufacturing while extending the life of a renewable resource. Paper recycling's success reflects decades of industry investment, innovation and partnership, as well as the efforts of millions of Americans who recycle paper every day. In 2025, we recycled approximately 45 million tons of paper, resulting in an overall paper recycling rate of 61%-65%. These results demonstrate that paper recycling continues to deliver measurable environmental and economic benefits.

Paper recycling is a vital part of the nation's manufacturing, our supply chain and recycling infrastructure. AF&PA member companies own and operate approximately 100 materials recovery facilities across the country, helping sort and prepare recyclable materials for manufacturing. In addition, roughly 80% of U.S. paper mills use recycled paper to make new products. This direct involvement gives our industry firsthand experience with the recycling system and reinforces our commitment to improving its performance.

Our industry's commitment to paper recycling spans more than 30 years. In the early 1990s, the paper industry voluntarily established recycling goals and continued to raise them as progress was made. Today, we recycle 60% more paper than we did 35 years ago. AF&PA members continue to build on that success through investments that strengthen recycling markets, increase recycled paper utilization, and advance manufacturing innovation. Companies built new mills, upgraded old ones, and modernized equipment. In 2019-2025, our industry invested in projects at paper mills that will use over 4.5 million additional tons of recycled paper. Our members are also developing recyclable paper versions of products such as mailers, transparent paper bags, can collars and canisters.

As regulators consider policies to further improve recycling outcomes, it is important to recognize that the paper recycling system has delivered measurable environmental and economic benefits through decades of industry investment, innovation and continuous improvement, providing a strong foundation for future recycling policy.

Please find below comments focused on areas of the draft rule language that the paper and fiber-based packaging industry would like to see improved for greater clarity in implementing the Recycling Reform Act (RRA). AF&PA respectfully requests that Ecology address these data quality, scope, and recycling-system characterization issues before finalizing the Preliminary Needs Assessment and using it as a baseline for future program planning.

Comments

Section 1.0 – Executive Summary and Recommendations

AF&PA supports Ecology's recommendation on page 8 to improve data collection and reporting for future needs assessments. However, the final report should recognize that obtaining a comprehensive understanding of Washington's recycling system will require participation from all segments of the value chain, including collectors, processors, material recovery facilities, brokers, end markets, and manufacturers. The full Needs Assessment should emphasize consistent reporting methodologies and robust protections for confidential business information to encourage meaningful participation from all stakeholders.

AF&PA agrees that the Preliminary Needs Assessment should focus on identifying existing market pathways and available capacity. Determinations regarding whether a market satisfies applicable responsible-market requirements should remain within the statutory implementation framework established under the Recycling Reform Act and should not be expanded through the Preliminary Needs Assessment or Needs Assessment process.

Section 3.0 – Methodology

Data Limitations and Transparency

AF&PA appreciates the report's acknowledgment of data limitations. However, the final report would benefit from additional transparency regarding data gaps, assumptions, extrapolations, and the degree of confidence associated with various findings. Given the

limited availability of standardized statewide data, readers should be able to clearly distinguish between direct observations, modeled estimates, and conclusions derived from incomplete datasets.

Use of Historical Data Sources

The report acknowledges on page 17 that older data sets were used to address information gaps where current data were unavailable. AF&PA recommends identifying where historical information was used, the specific gaps it was intended to address, and any limitations associated with relying on older datasets. Such transparency will improve stakeholder understanding of the strengths and limitations of the analysis.

Survey Response Rates and Representativeness

The report identifies limited participation across multiple stakeholder groups. The assessment reports responses from 11 of 54 collection service providers, 45 of 321 municipal and county contacts, 3 of 7 material recovery facilities, 24 of 65 organics facilities, and 52 of 160 transfer station and public drop-off facilities. AF&PA recommends that the final report clearly caution readers against interpreting survey findings as representative of statewide conditions absent additional supporting data. The report should also identify when survey results are based on only the subset of respondents that answered a particular question.

Request for Information Process

On page 19, the report notes that Ecology received thirty responses through its Request for Information process but provides limited detail regarding the information, studies, or datasets submitted. AF&PA recommends describing the materials received, identifying the portions of the analysis they informed, and explaining how conflicting or incomplete submissions were evaluated.

Section 4.0 – Service Contracts and Costs

Cost Methodology and Outlier Treatment

In Section 4.2.1, AF&PA recommends providing additional explanation regarding the treatment of cost outliers and the significant variation observed in reported recycling costs. The report excludes values below $50 per ton and above $3,000 per ton but does not explain whether these values reflected reporting inconsistencies, differences in service scope, geographic factors, or other circumstances. The final report should explain the basis for these thresholds, identify the number of observations excluded, and describe the effect of those exclusions on regional and statewide estimates. The report should also provide context for the extremely large range of service provider costs that is considered within the normal range.

Consistency of Cost Reporting

The report acknowledges that participants may have reported gross or net costs, included or excluded commodity revenue, used different service definitions, or reported different units. AF&PA recommends further discussion of how these differences were normalized or otherwise addressed and how the resulting uncertainty affects the reported statewide

average. The report should avoid presenting the estimate as broadly representative until the underlying cost elements are defined consistently.

Section 5.0 – Covered Materials Collected in Washington

Maintaining Statutory Scope/Clarification of Material Categories

AF&PA recommends that the final report maintain a clear and consistent distinction between statutorily covered materials and non-covered materials. The report indicates that the underlying analysis initially considered both covered and non-covered materials before separating them and acknowledges that producer-supplied data are not yet available to validate the resulting estimates. Given these limitations, Ecology should clearly identify the methodology, assumptions, and data sources used to distinguish covered from non-covered materials and ensure that non-covered paper and paper products remain separately identified at every stage of the analysis. The assessment acknowledges that MRFs and end markets generally track recovered commodity/bale grades that may combine covered and non-covered material. Ecology should establish a transparent methodology for determining what portion of collection, sorting and processing costs is actually attributable to covered material. Because the Preliminary Needs Assessment will serve as a baseline for future program planning and evaluation, findings that include non-covered materials should not be used to establish program obligations, allocate program funding, inform producer costs, or develop performance targets beyond the scope of the Recycling Reform Act.

Residential Material Estimates

The report does not clearly enough note that certain underlying datasets combine residential and nonresidential material streams and that residential estimates were derived through additional analysis. AF&PA recommends providing greater detail regarding the methodology, assumptions, and limitations associated with those estimates. The final report should identify where residential quantities were directly reported, where they were modeled or extrapolated, and how uncertainty was treated.

Validation of Material Generation Estimates

AF&PA recommends that Ecology evaluate whether waste and recycling composition-study data used to estimate covered-material generation have been adjusted for residual contents, moisture, and adhering contamination. Certain paper and fiber-based materials, including food-contact packaging and cartons, may be disproportionately affected by these factors, which can inflate measured field weights and resulting statewide generation estimates. The final report should identify any correction factors applied, explain their source and methodology, and describe how the adjustments affect material-specific estimates.

Ecology should also benchmark modeled Washington generation estimates against relevant regional, neighboring-state, and national datasets. Where the Preliminary Needs Assessment estimates differ materially from comparable benchmarks, the final report should explain the basis for the difference and assess whether additional validation or revised assumptions are warranted.

Material-specific estimates derived primarily from extrapolated composition-study data should not be treated as definitive program baselines until they have been validated against independent data sources. The final report should clearly identify modeled estimates, provide confidence ranges or other measures of uncertainty where practicable, and caution against using unvalidated quantities to establish future program obligations, funding allocations, performance targets, or evaluations.

Weight-Based Characterization of Covered Materials

The report repeatedly identifies paper packaging and paper products as the largest covered-material categories by weight. While this observation is supported by the report's estimates, AF&PA encourages Ecology to avoid treating weight as a proxy for recycling-system need or performance. The report's own data shows substantial recycling of several paper categories, including cardboard and kraft packaging. The assessment estimates that cardboard and kraft packaging are the largest paper category by weight, while also showing substantial recycling of that material. High tonnage should not automatically translate into a conclusion that fiber requires a proportionately larger share of EPR investment or cost. Ecology should look at recovery performance, existing infrastructure, processing requirements and end-market strength alongside weight when determining actual system needs.

Material weight alone should not drive future investment or policy conclusions.

Clarification of Material Categories

AF&PA recommends defining ambiguous material categories used in the analysis, including "other paper products," "potentially compostable paper packaging," "composite paper products," "composite paper packaging" and "uncoated short-fiber paper products." Clear definitions and category-to-source mappings are necessary for stakeholders to evaluate generation, collection, and market findings and to confirm consistency with the statewide collection lists.

Self-Haul Recycling Estimates

The self-haul analysis reports relatively low recycling tonnages across numerous material categories, including fiber commodities commonly recovered through drop-off or direct-haul systems. AF&PA recommends that Ecology explain how residential self-haul quantities were separated from nonresidential flows, identify the composition studies applied to the self-haul stream, and describe the uncertainty associated with the resulting material-specific estimates. These estimates should not be used as a program baseline without further validation.

Section 6.0 – Collection Service Levels and Availability

Collection Service Data Limitations

AF&PA recommends that the report more prominently communicate the limitations associated with service-availability and participation data. Availability does not establish subscription or participation, and the report identifies substantial unknown multifamily availability in certain regions. The final report should consistently distinguish known

unavailability from missing data and should avoid treating survey-based participation findings as statewide estimates.

Gap Analysis Mapping

AF&PA encourages Ecology to improve the readability and usability of the gap-analysis maps. Clearer legends, larger labels, simplified layers, and a more accessible explanation of "available," "limited," "unavailable," and "no data" would help stakeholders distinguish actual service gaps from data gaps.

Section 7.0 – Statewide Facilities and Processing Capacity

Balanced Discussion of Recovered Fiber Processing

The report's key findings highlight markets for PET and HDPE but provide comparatively limited discussion of paper and other commodities. This is notable because the report later identifies corrugated cardboard and mixed paper as the largest outbound MRF streams by weight and describes robust end-market demand for fiber. AF&PA recommends that Section 7 provide a balanced discussion of recovered fiber acceptance, processing, outbound grades, and market pathways, rather than over emphasizing plastic commodities in the facility overview.

Design Capacity Versus Practical Capacity

The report compares approximately 675,000 tons of annual inbound MRF material with approximately 899,000 tons of reported design capacity. AF&PA supports the report's caveat that this difference is not a measured operating reserve. The final report should consistently characterize the 25 percent difference as a design-capacity margin, not "usable" or "available" capacity, unless facility-specific operating constraints, downtime, staffing, storage, material mix, and quality requirements have been evaluated.

Commodity and End-Market Data Sources

AF&PA recommends additional explanation regarding how commodity-specific market information was collected, validated, and attributed. Where the report makes statements about fiber demand or facility acceptance, it should identify whether the conclusion is based on facility surveys, annual reports, interviews, public information, or other sources.

Section 8.0 – Current End Markets

End-Market Methodology and Transparency

Because the end-market analysis relies on Resource Recycling Systems' internal end-market database, public information, and stakeholder input, AF&PA recommends providing additional information regarding how facilities were identified, screened, verified, and determined to be reasonably likely destinations for Washington-generated recovered materials. The final report should also identify the source and date of facility-capacity and acceptance information wherever practicable.

"Responsible" End Market Criteria

We caution against evaluating whether markets meet the Recycling Reform Act's criteria for "responsible" in the Needs Assessment. The needs assessment should focus on market identification, capacity, and material flows, not policy determinations. AF&PA supports evaluating existing end-market pathways, material flows, and available processing capacity. However, the Needs Assessment should not establish new criteria for determining whether an end market is "responsible" or attempt to assess compliance with responsible end market requirements. Such determinations should remain with the PRO or Ecology. The Needs Assessment should focus on objectively characterizing markets and available infrastructure rather than creating new policy standards or subjective market classifications.

Mixed Paper Market Characterization

AF&PA recommends that Ecology reconcile the narrative discussion of mixed paper markets with the capacity figures presented in Tables 27 and 29. Table 27 identifies approximately 400,000 tons per year of in-state mixed paper capacity and approximately 164,000 tons per year of out-of-state capacity, while Table 29 reports approximately 230,170 tons of Washington recovered mixed paper, including packaging and non-packaging material. These figures do not, by themselves, establish available capacity for Washington material; however, they also do not support an unqualified conclusion that mixed paper lacks domestic market capacity. The final report should clarify the basis for any statement regarding mixed paper market constraints and distinguish facility count from market capacity and actual access.

Strength of Corrugated End Markets

Table 29 identifies approximately 664,777 tons of Washington recovered old-corrugated cardboard and approximately 1.714 million tons per year of in-state OCC processing capacity. Although total mill capacity is not equivalent to spare capacity available to Washington-generated material, the figures demonstrate substantial in-state manufacturing demand for recovered corrugated fiber. AF&PA recommends that the final report more clearly acknowledge this established market infrastructure and avoid presenting fiber-market conclusions in a manner that obscures the strength of the OCC market.

Mapping Covered Materials to Commodity Grades

The report correctly recognizes that end markets generally purchase recovered commodity grades rather than individual covered-material categories. AF&PA recommends providing a transparent crosswalk showing how each paper and fiber covered-material category was mapped to recovered-paper commodity or bale grades. The methodology should use recognized grade terminology where applicable and explain any aggregation of cartons, mixed paper, newsprint, office paper, and corrugated grades.

Reference to Paper Cups

The report states that in-state and regional capacity is strongest for old-corrugated containers and "other paper cups," but paper cups are not identified as a distinct covered-material category in the report's material framework. AF&PA recommends correcting or clarifying this reference and identifying the covered-material category and commodity grade

represented. The final report should not infer that a facility accepts only paper cups, or all polycoated paper packaging, based on a source showing acceptance of certain cup formats.

Facility Acceptance Claims

AF&PA recommends documenting and validating the facility acceptance information presented in Table 30. Recovered-fiber procurement specifications are variable by mill, grade, quality, and market conditions. Customer specifications drive the use of bales by a mill on a day-by-day basis. The final report should distinguish confirmed current procurement from a facility identified as a potential end market. If facility-specific information cannot be validated, Ecology should present the information at an aggregated level.

Out-of-State Mill Statement

The report states that three out-of-state mills within 250 miles of Washington's border accept only old-corrugated cardboard, but it does not identify those mills or provide the supporting source. AF&PA recommends identifying the facilities and supporting information or revising the statement to reflect the limits of the available evidence. We also recommend examining what materials those out of state mills accept, as it is likely that they procure more than just grade 11 and 12 bales.

Market Capacity Versus Market Access

The report appropriately recognizes that total facility capacity does not equal capacity available to Washington-generated materials. AF&PA recommends applying this distinction consistently and differentiating among total nameplate or reported capacity, current throughput, practical available capacity, capacity accessible to Washington material, and verified material flows. The existence of total facility capacity should not be treated as proof of market access, while the absence of facility-specific available-capacity data should not be treated as proof of a market constraint.

Confidential Business Information

AF&PA strongly encourages Ecology and its consultants to maintain robust protections for confidential business information during development of the full Needs Assessment. Meaningful participation from all stakeholders depends on confidence that commercially sensitive information will be protected, aggregated, and anonymized consistent with the Recycling Reform Act. Ecology should clearly communicate these protections before requesting facility-specific pricing, capacity, sourcing, customer, or material-flow information.

Section 9.0 – Conclusions

Material Recovery Facility Capacity Conclusions

AF&PA recommends revising the conclusions regarding MRF capacity to distinguish reported design capacity from practical operating capacity and capacity available for additional covered materials. The current language is unclear and could be interpreted as equating the difference between annual inbound tonnage and design capacity with an available operating

reserve. The conclusion should instead reflect the report's own limitations regarding equipment, staffing, storage, downtime, material quality, transportation, and material mix.

Conclusion

Thank you for your consideration of our comments. We appreciate the ongoing collaboration to advance a sustainable recycling system. We remain available to discuss the feedback herein in greater detail and look forward to your response. Please contact Shoshana Micon, Manager, Recycling and Packaging Sustainability, at shoshana_micon@afandpa.org if you have any further questions.

Sincerely,



Mark Pitts

Vice President, Industry Affairs

American Forest & Paper Association